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BY ECF

August 13, 2014

The Honorable John Gleeson
United States District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: *United States v. Agron Hasbajrami*
Criminal Docket No. 11-cr-623 (JG)
Civil Docket No. 13-cv-6852 (JG)

Dear Judge Gleeson:

For the reasons set forth below, I write to request that the Court modify the scheduling order issued in this case.

Pursuant to the current scheduling ordered, as modified on August 4, 2014, the government's opposition was timely filed on August 8, 2014; Hasbajrami's reply is due on or before August 18, 2014, and argument on the motion is currently scheduled for September 12, 2014. Given the length of the government's opposition and the fact that counsel for the defendant/petitioner are out of the Country until August 25 and August 30, respectively, I respectfully request that the time to file a reply be extended to September 2, 2014. All other aspects of the scheduling order shall remain unchanged.

I have discussed this request with the attorney for the government, Assistant United States Attorney, Seth DuCharme, and he advises me that the government does not object. Accordingly, we respectfully request that the proposed amended scheduling order be adopted by the Court.¹

Thank you for your consideration in this matter.

Respectfully submitted,

Steve Zissou

Steve Zissou

cc: Seth Ducharme, AUSA

¹Should the government feel the need to respond to any additional submission, an application for leave to do so will be made at the appropriate time.